

EXHIBIT 7

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**FEDERAL INSURANCE COMPANY'S
SEVENTH SUPPLEMENTAL
ANSWER TO PLAINTIFF'S
INTERROGATORY NO. 17**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY, a
Pennsylvania corporation,

Defendants.

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein and Michael A. Erbele, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Seventh Supplemental Answer to Plaintiff's Interrogatory No. 17, states and alleges as follows:

GENERAL RESPONSES

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.

3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to amend,

supplement, or change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

4. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

SEVENTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 17

INTERROGATORY NO. 17: For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Defendants and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

SUPPLEMENTAL ANSWER: Federal objects to the request for “all” insurance policies as overbroad, unduly burdensome, and not proportional to the needs of this case. Federal also objects to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Federal also objects to this Interrogatory as vague and ambiguous in failing to identify the relevant “use” and calling for insurance policies “in connection with.” Federal further objects to this Interrogatory because “the gross written premium” of Defendants and the “gross written premium of each related company” are not relevant to any claim or defense in this action, including because Defendants’ profits are not reasonably related to the alleged infringement, as is necessary for FICO to obtain an award of the defendants’ profits. *See, e.g., Francois v. Ruch*, 2006 WL 3735950, at *3 (C.D. Ill. Dec. 15, 2006). Federal further objects to the extent the Interrogatory seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states the following:

- For the Financial Lines Unit (post-merger) for the years identified below, the following applications use Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, Profitability Indicator, and Defined Book Run. The approximate gross

• **For CUW-IM:¹**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB CUSTOM INSURANCE COMPANY	2,127	\$217,444,131.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	8	\$41,810.00
	CHUBB EUROPEAN GROUP SE	44	\$260,360.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,475	\$515,778,122.00
	CHUBB INSURANCE AUSTRALIA LIMITED	6	\$223,981.00
	CHUBB INSURANCE COMPANY LIMITED	4	\$10,686.00
	CHUBB INSURANCE COMPANY OF CANADA	7	\$173,352.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,635	\$69,278,561.00
	CHUBB NATIONAL INSURANCE COMPANY	1,223	\$50,975,438.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$4,281.00
	EXECUTIVE RISK INDEMNITY INC.	13	\$2,167,006.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	28	\$4,528,627.00
	FEDERAL INSURANCE COMPANY	141,235	\$4,800,540,559.00
	GREAT NORTHERN INSURANCE COMPANY	30,523	\$868,809,231.00
	PACIFIC INDEMNITY COMPANY	4,568	\$426,214,814.00
	VIGILANT INSURANCE COMPANY	6,478	\$307,080,046.00
	ACE American Insurance Co	2,890	\$108,983,073.98
	ACE Fire Underwriters Ins	38	\$1,092,991.43
	ACE Property and Casualty	768	\$106,304,729.88
	Illinois Union Insurance	1,183	\$81,709,115.00
	Indemnity Insurance Co of	97	\$17,014,247.06
	Pacific Employers Insurance	6	\$469,700.00
	Westchester Surplus Lines	132	\$12,587,416.00
	WFIC for Bus.Eff.1/1/11	1,010	\$31,266,954.00
2017	CHUBB CUSTOM INSURANCE COMPANY	1,119	\$125,046,576.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$12,403.00
	CHUBB EUROPEAN GROUP SE	40	\$368,955.00
	CHUBB INDEMNITY INSURANCE COMPANY	5,986	\$581,425,852.00
	CHUBB INSURANCE AUSTRALIA LIMITED	2	\$5,554.00
	CHUBB INSURANCE COMPANY LIMITED	3	\$7,913.00
	CHUBB INSURANCE COMPANY OF CANADA	2	\$14,184.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,432	\$65,809,698.00
	CHUBB NATIONAL INSURANCE COMPANY	1,906	\$68,554,767.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$16,297.00
	EXECUTIVE RISK INDEMNITY INC.	11	\$2,732,882.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	11	\$1,102,030.00
	FEDERAL INSURANCE COMPANY	147,481	\$5,098,798,285.00
	GREAT NORTHERN INSURANCE COMPANY	31,605	\$912,720,319.00
	PACIFIC INDEMNITY COMPANY	4,825	\$468,474,693.00
	VIGILANT INSURANCE COMPANY	6,461	\$324,338,205.00
	ACE American Insurance Co	8,243	\$354,885,926.81
	ACE Fire Underwriters Ins	53	\$1,722,590.00
	ACE Property and Casualty	2,413	\$248,919,844.00

¹ We understand that this financial information includes policies that were brought in under a system that includes policies that are renewed using Blaze, but automatically at the same time includes the prior transaction involving the same policy regardless whether it uses Blaze. We are seeking a way to not include the prior policy since it results in the financial information having inflated numbers.

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	Illinois Union Insurance	3,444	\$255,341,641.00
	Indemnity Insurance Co of	281	\$21,351,439.00
	Pacific Employers Insurance	21	\$869,381.00
	Westchester Surplus Lines	476	\$45,285,709.00
	WFIC for Bus.Eff.1/1/11	2,246	\$67,191,783.00
2018	CHUBB CUSTOM INSURANCE COMPANY	610	\$68,563,377.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	1	\$16,435.00
	CHUBB EUROPEAN GROUP SE	16	\$85,623.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,962	\$443,033,892.00
	CHUBB INSURANCE AUSTRALIA LIMITED	1	\$25,208.00
	CHUBB INSURANCE COMPANY LIMITED	1	\$6,135.00
	CHUBB INSURANCE COMPANY OF CANADA	1	\$6,754.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	1,799	\$32,946,513.00
	CHUBB NATIONAL INSURANCE COMPANY	1,582	\$66,309,955.00
	CHUBB SEGUROS BRASIL, S.A.	1	\$642.00
	EXECUTIVE RISK INDEMNITY INC.	6	\$1,661,561.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	3	\$213,165.00
	FEDERAL INSURANCE COMPANY	90,925	\$3,558,748,157.00
	GREAT NORTHERN INSURANCE COMPANY	22,807	\$710,266,687.00
	PACIFIC INDEMNITY COMPANY	3,356	\$369,995,206.00
	VIGILANT INSURANCE COMPANY	4,193	\$227,639,141.00
	ACE American Insurance Co	6,740	\$274,751,661.00
	ACE Fire Underwriters Ins	38	\$1,498,240.00
	ACE Property and Casualty	1,971	\$191,070,156.00
	Illinois Union Insurance	3,372	\$240,820,970.00
	Indemnity Insurance Co of	175	\$13,196,308.00
	Pacific Employers Insurance	14	\$51,084.00
	Westchester Surplus Lines	602	\$49,388,448.00
	WFIC for Bus.Eff.1/1/11	1,273	\$36,242,321.00
2019	CHUBB CUSTOM INSURANCE COMPANY	43	\$6,693,927.00
	CHUBB INDEMNITY INSURANCE COMPANY	486	\$50,083,542.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	97	\$2,469,028.00
	CHUBB NATIONAL INSURANCE COMPANY	124	\$6,526,910.00
	FEDERAL INSURANCE COMPANY	6,032	\$417,370,954.00
	GREAT NORTHERN INSURANCE COMPANY	1,745	\$97,044,347.00
	PACIFIC INDEMNITY COMPANY	233	\$39,736,490.00
	VIGILANT INSURANCE COMPANY	220	\$25,155,354.00
	ACE American Insurance Co	374	\$13,255,599.00
	ACE Fire Underwriters Ins	2	\$185,620.00
	ACE Property and Casualty	23	\$7,502,715.00
	Illinois Union Insurance	270	\$24,843,797.00
	Indemnity Insurance Co of	4	\$66,049.00
	Westchester Surplus Lines	3	\$538,022.00
	WFIC for Bus.Eff.1/1/11	18	\$174,830.00

• **For TAPS:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB INDEMNITY INSURANCE COMPANY	207	\$73,264,108.51

Dated: July 16, 2019

s/Terrence J. Fleming
Terrence J. Fleming (#0128983)
tfleming@fredlaw.com
Leah Janus (#0337365)
ljanus@fredlaw.com
Christopher D. Pham (#0390165)
cpham@fredlaw.com
FREDRIKSON & BYRON, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425
(612) 492-7000 (tel.)
(612) 492-7077 (fax)

Attorneys for Defendants

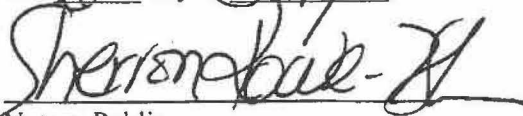
VERIFICATION

Sarada Kotha states under oath that she is an IT Business Analyst; that she is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to Defined Book Run; that she has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of her knowledge.



Sarada Kotha

Subscribed and sworn to before me
this 10th day of JUN, 2019.



Notary Public

SHERRON ROWE-HOHN
Notary Public - State of New Jersey
My Commission Expires Sep 5, 2021